



James D. Hartt, Esq.
Attorney At Law

August 10, 2021

SENT VIA CM/ECF

Hon. Therese Wiley Dancks, U.S. Magistrate Judge
U.S. District Court for the Northern District of New York
Federal Building and Courthouse
100 South Clinton Street
Syracuse, New York 13261

Re: Mary Ellen Buckhout v. State University of New York, Upstate Medical University
Civil Action 5:19-cv-01602-MAD-TWD

Dear Judge Dancks:

Please accept this letter on behalf of Plaintiff Mary Ellen Buckhout (“Plaintiff”), requesting a 60-day extension of the deadline for Plaintiff to file its response in opposition of the pending Motion for Summary Judgment filed August 4, 2021, Docket No. 45.

The current deadline is Wednesday, August 25th, 2021. Plaintiff requests an extension until Monday, October 25, 2021. Plaintiff has not made any prior requests for adjournments or extensions in connection with the pending Motion for Summary Judgment. Plaintiff also requests that Defendant’s Reply currently due by Wednesday, September 1, 2021 be extended to Monday, November 1, 2021. Please also note that Defendant’s counsel Jonathan Reiner graciously consented to this extension request.

Thank you for your consideration.

Respectfully submitted,
A handwritten signature in black ink, appearing to read "James Hartt".
James D. Hartt, Esq.

Cc: All Counsel of Record (via CM/ECF)

Fairport Main Office
6 North Main Street, Suite 200F
Fairport, New York 14450

Cell (585)-490-7100

Syracuse Office
141 First Street
Liverpool, New York 13088

Toll Free: 1-(888)-425-8682

Buffalo Office
3959 N. Buffalo Rd., Suite 40
Orchard Park, New York 14127

Fax: 716-299-2006

james@harttlegal.com
Admitted in New York, New Jersey, and Arizona